

EXHIBIT A

From: [Steinberg, Joachim](#)
To: [Barsanti, Vanessa](#); [Ginder, Cameron](#)
Cc: [ROSS-AT Team](#); [#Thomson-Ross](#)
Subject: RE: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS
Date: Monday, May 15, 2023 7:39:25 AM

This message is from an EXTERNAL SENDER

Be cautious, particularly with links and attachments.

Vanessa,

ROSS believes that the production is still deficient. In addition to missing the substantial completion deadline, failing to identify appropriate custodians, and producing documents so that ROSS could not use them with fact witnesses, we also believe there may still be gaps in the production, including agreements identified within your interrogatory responses. While we are working to determine that as quickly as possible, given the schedule, and the Court's statement that we could renew our request, we intend to raise this with the Court immediately.

Best,
Joachim

Joachim B. Steinberg

Pronouns: he/him/his
Crowell & Moring LLP
jsteinberg@crowell.com
+1.415.365.7461 direct | +1.917.575.6244 mobile

From: Barsanti, Vanessa <vanessa.barsanti@kirkland.com>
Sent: Friday, May 12, 2023 3:02 PM
To: Steinberg, Joachim <JSteinberg@crowell.com>; Ginder, Cameron <cameron.ginder@kirkland.com>
Cc: ROSS-AT Team <ROSS-ATTeam@crowell.com>; #Thomson-Ross <thomson-ross@kirkland.com>
Subject: RE: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS

External Email

Joachim,

How did Thomson Reuters fail to produce documents in time? It produced all the documents it said it would on May 11, as it told the Court and as the Court found acceptable.

Vanessa Barsanti

She/Her/Hers

KIRKLAND & ELLIS LLP
300 North LaSalle, Chicago, IL 60654
T +1 312 862 2205

F +1 312 862 2200

vanessa.barsanti@kirkland.com

From: Steinberg, Joachim <JSteinberg@crowell.com>

Sent: Friday, May 12, 2023 2:58 PM

To: Barsanti, Vanessa <vanessa.barsanti@kirkland.com>; Ginder, Cameron
<cameron.ginder@kirkland.com>

Cc: ROSS-AT Team <ROSS-ATTeam@crowell.com>; #Thomson-Ross <thomson-ross@kirkland.com>

Subject: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS

Vanessa and Cameron,

ROSS intends to ask the Court to extend the expert discovery schedule by 30 days and to extend all dates by 30 days, pursuant to the Court's May 1 order permitting ROSS to renew its request at the close of fact discovery, because Plaintiffs failed to produce documents in time. Will you stipulate to that extension? Otherwise we will file our letter brief with the Court.

Best regards,

Joachim

Joachim B. Steinberg

Pronouns: he/him/his

jsteinberg@crowell.com

+1.415.365.7461 direct | +1.917.575.6244 mobile

[LinkedIn](#)

Crowell & Moring LLP
3 Embarcadero Center
26th Floor
San Francisco, CA 94111

Crowell

Collaboration Powers Success

crowell.com

This message may contain privileged and confidential information. IF IT WAS SENT TO YOU BY MISTAKE, DO NOT READ IT. Instead, please notify the sender (or postmaster@crowell.com) by reply e-mail, and delete this e-mail. Unauthorized dissemination, forwarding or copying of this e-mail is strictly prohibited.

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Kirkland & Ellis LLP or Kirkland & Ellis International LLP. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return email or by email to postmaster@kirkland.com, and destroy this communication and all copies thereof, including all attachments.